

DECLARATION OF DEPUTY JAMES STRATTON

I, JAMES STRATTON, do hereby declare:

BACKGROUND AND EXPERIENCE

1. I am a Deputy United States Marshal and have been so employed since October of 2002. I am currently assigned to the United States Attorney's Office as the Asset Forfeiture Financial Investigator in the District of Oregon, Portland Office. My duties include supporting Department of Justice led criminal investigations with the identification and seizure of assets associated with criminal activity and the initiation of civil or criminal forfeiture action against these assets. In the course of my employment as a Deputy United States Marshal, I have received training in conducting financial, money laundering, and Bank Secrecy Act investigations.

PURPOSE OF DECLARATION

2. This declaration is submitted in support of a Complaint *in rem* for forfeiture of the following sixteen properties, hereafter referred to collectively as, the "Subject Properties."
3. **Subject Property 1:** 91844 Rulyville Road, Clatskanie, Oregon 97016
Parcel Number: 806260003700
Description: Beginning at the Northeast corner of a tract of land conveyed by Wauna Lumber Company to Lawrence Sorensen and Edna V. Sorensen by Deed recorded March 30, 1962 in Book 263, Page 553, Clatsop County Records; thence Southeasterly along the Easterly line of said tract of land to a point on the Northerly right of way line of the existing county road; thence Easterly along said Northerly right of way line a distance of 425 feet, more or less, to a point on the Southwesterly right of way line of the existing U. S. Highway No. 30; thence Northwesterly along said Southwesterly right of way line a distance of 550 feet; thence in a Southwesterly direction a distance of 300 feet, more or less, to the point of beginning, all of

the above being situate in Tracts 11 and 12, WAUNA ACREAGE TRACTS, County of Clatsop, State of Oregon.

EXCEPTING THEREFROM the following described tract:

A parcel of land lying in Tract 11 of WAUNA ACREAGE TRACTS, County of Clatsop, State of Oregon, and being a portion of that property described in that Deed to Nick A. Hazapis and Mary N. Hazapis recorded in Book 267, Page 169, Clatsop County Records, the said parcel being that portion of said property included in a strip of land variable in width lying on the Southwesterly side of the centerline of the Columbia River Highway as said Highway has been relocated, which centerline is described as follows:

Beginning at Engineer's Centerline Station 208+00, said Station being 1219.97 feet North and 1792.64 feet West of the East quarter corner of Section 27, Township 8 North, Range 6 West, Willamette Meridian; thence South 49°42' East 2900 feet to Engineer's Centerline Station 237+00.

The widths in feet of the strip of land above referred to are as follows:

WIDTH OF SOUTHWESTERLY

STATION TO STATION		SIDE OF CENTERLINE
216+75	219+00	Northeasterly line of County Road
219+00	219+75	400 taper to 250
219+75	221+50	250 taper to 115
221+50	222+00	115 taper to 100
222+00	224+00	100
224+00	226+00	100 taper to 130

Title for Subject Property 1 is held in the name of R & Y 7206, LLC.

4. **Subject Property 2:** 74853 Palm Creek Road, Clatskanie, Oregon 97016

Parcel Number: 7424-00-00401

Description: The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Columbia, State of Oregon:

Beginning at the Northwest corner of the Northwest quarter of the Northeast quarter of Section 24, Township 7 North, Range 4 West, Willamette Meridian, Columbia County, Oregon; thence South 2°20' East 544.9 feet; thence South 57°24' East 928.6 feet to a point in Lindberg County Road Number P-64; thence South 56°36' West 20 feet to a point on the West boundary of the County Road and true point of beginning of the following described tract; thence West 300 feet to a point; thence North 155 feet; thence East to the West boundary of said County Road; thence South, along the West line of said road to the true point of beginning.

Title for Subject Property 2 is held in the name of Zhou Qu Rong.

5. **Subject Property 3:** 74471 Palm Creek Road, Clatskanie, Oregon 97016

Parcel Number: 7319-00-00401

Description: The portion of Government Lot 3 in Section 19, Township 7 North, Range 3 West, Willamette Meridian, Columbia County, Oregon, described as follows:

Beginning at a point which is South 86 degree 58' East 402.50 feet from the West quarter corner of said Section 19, said point being on the North line of the Southwest quarter of said Section 19; thence South 1 degree 56'20" West a distance of 360.00 feet; thence South 86 degree 58' East a distance of 302.50 feet; thence North 1 degree 56'20" West a distance of 360.00 feet to the North line of said Southwest quarter; thence North 86 degree 58' West along said North line a distance of 302.50 feet to the point of beginning.

Title for Subject Property 3 is held in the name of Zhonghong Liao.

6. **Subject Property 4:** 22197 Swedetown Road, Clatskanie, Oregon 97016

Parcel Number: 7331-00-00500

Description: A tract of land in the Southwest quarter of Section 31 Township 7 North, Range 3 West of the Willamette Meridian, Columbia County, Oregon described as follows:

Beginning at a point in the center of a creek 5 links wide, that is North 01°04' West, along section line 20.12 chains and North 89°49' East 14.96 chains from the Southwest corner of Section 31, Township 7 North, Range 3 West of the Willamette Meridian, Columbia County, Oregon, from said point of beginning; running thence in a Southerly direction following the channel of said creek upstream 846.5 feet to the Northern boundary line of a certain County Road Survey (course of said road at this point being East and West); thence in a Easterly direction following said Northern boundary line of said survey 165.0 feet; thence North 14°30' East 875.5 feet; thence West 350 feet to the point of beginning.

Title for Subject Property 4 is held in the names Manching Lai, and Junmei He.

7. **Subject Property 5:** 6525 Rickreall Road, Independence, Oregon 97351

Parcel Number: 07427-00-00502

Description: The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Polk, State of Oregon:

Part of the James M. Allen DLC No. 50, Notification No 118, in Sections 27 and 34, Township 7 South of Range 4 West of the Willamette Meridian; Beginning at a point 33.98 chains West of the Southeast corner of the Donation Land Claim of James M. Allen Notification No. 118, Claim No. 50. in Township 7 South, Range 4 West of the Willamette Meridian; thence East 8.61 chains to an iron pipe 2 inches by 6 feet long; thence North 45.69 chains to a stone in the center of the County Road; thence North 83° West 8.73 chains along

the center of said County Road; thence South 46.80 chains to the place of beginning.

Title for Subject Property 5 is held in the name of 7220 Investments LLC.

8. **Subject Property 6:** 17344 Powers Creek Loop NE, Silverton, Oregon 97381

Parcel Number: 071E09C 0030

Description: The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Marion, State of Oregon:

PARCEL I:

A tract of land situated in the South one-half of Section 9, Township 7 South, Range 1 East of the Willamette Meridian, in the County of Marion, State of Oregon, more particularly described as follows:

Beginning on the North line of the M. Coolidge Donation Land Claim No. 43 in Township 7 South, Range 1 East of the Willamette Meridian in Marion County, Oregon, at a point which is 1250.00 feet East of the Northwest corner of said claim; thence East 100.00 feet; thence South 00° 23' West 616.48 feet; thence South 89°33' East 206.00 feet; thence South 00°27' West 184.30 feet; thence South 89°33' East 349.10 feet; thence South 00°27' West 217.86 feet; thence West 654.66 feet; thence North 00°23' East 1023.00 feet to the place of beginning.

PARCEL II:

A tract of land situated in the South one-half of Section 9, Township 7 South, Range 1 East of the Willamette Meridian, in the County of Marion, State of Oregon, more particularly described as follows:

Beginning at a point which is 1350.00 feet East and South 00°23' West 616.48 feet and South 89°33' East 206.00 feet from the Northwest corner of the M. Coolidge Donation Land Claim

No. 43 in Township 7 South, Range 1 East of the Willamette Meridian in Marion County, Oregon, which point is the most Westerly Northwest corner of property described in a conveyance to Harold D. Powell, recorded September 20, 1979 in Reel 185, Page 177, Deed Records for Marion County, Oregon; thence South 00°27' West 184.30 feet; thence South 89°33' East 146.80 feet to a point on the East line of the M. Coolidge Donation Land Claim No. 43; thence North 00°27' East 184.30 feet to the Southeast corner of the property described in a conveyance to G.A. and L.A. Patterson, recorded in Reel 777, Page 144, Deed Records for Marion County, Oregon; thence North 89°33' West, along said South line, to the place of beginning.

Title for Subject Property 6 is held in the name of Jin Feng Li.

9. **Subject Property 7:** 1305 Clark Mill Road, Sweet Home, Oregon 97386

Parcel Number: 13S 01E 32AA 00203

Description: The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Linn, State of Oregon.

Beginning at a point on the Westerly right of way line of Clark Mill Road that is South 0° 07' 18" East, 2444.28 feet and South 89° 52' 42" West, 40.00 feet from the Northeast Quarter of the Northeast Quarter of Section 32, Township 13 South, Range 1 E, Willamette Meridian, Linn County, Oregon; running thence South 0° 07' 18" East along said Westerly right of way line 161.53 feet; thence South 77° 00' 39" West, 125.30 feet; thence North 59° 57' 45" West 21.14 feet; thence; North 0° 01' 11" West, 155.85 feet; thence North 46° 04' 38" East, 24.46 feet; thence North 81° 51' 30" East, 70.32 feet thence South 86° 02' 07" East, 53.00 feet in the point of beginning

TOGETHER WITH an easement for Ingress and egress described as follows:

Beginning at a point in the center of Clark Mil Road, said point being North 89° 55' West 835.16 feet and South 0° 03' East 152.37 feet from the Northeast corner of Section 32, Township 13 South, Range 1 East of the Willamette Meridian, Linn County, Oregon; running thence South 76° 53' West 165.28 feet to an iron rod; thence South 0° 03' East 30.80 feet; thence North 76° 53' East 165.28 feet to the center of said road; thence North 0° 03' West 30.80 feet to the point of beginning.

Title for Subject Property 7 is held in the name of T & Y 6409 Inc.

10. **Subject Property 8:** 31131 Old Santiam Hwy, Lebanon, Oregon 97355

Parcel Number: 12S 01W 29C 00200

Description: The following described real property in the County of Linn and State of Oregon free of encumbrances except as specifically set forth herein:

Beginning at an iron pipe, which is 2655.04 feet North and 230 feet South 89° 48' East of the Southwest corner of the Elmore Keys D.L.C. No. 53, in Section 29, Township 12 South, Range 1 West of the Willamette Meridian in Linn County, Oregon; thence South 89° 48' East 264.18 feet to a 1/2" iron pipe; thence South 23° 03' West 218.55 feet, more or less, to the North line of the Old Lebanon-Sweet Home Highway; thence North 69° 11' West along said North line 191.1 feet to a 1" axle; thence North 134.1 feet to the point of beginning, all being situated in Linn County, Oregon.

Title for Subject Property 8 is held in the name of 31131 Investment LLC.

11. **Subject Property 9:** 20250 Highway 22, Sheridan, Oregon 97378

Parcel Number: 06629-00-00100

Description: A tract of land located in Section 29, Township 6 South, Range 6 West, of the

Willamette Meridian in Polk County, Oregon, being more particularly described as follows:

Commencing at an iron rod marking a point on the northerly margin of Oregon State Highway 22, 40.00 feet from the centerline thereof, that is North 36.43 feet and East 607.83 feet from an aluminum cap in concrete marking the southwest corner of the John Ridgeway Donation Land Claim No. 43, said Township and Range; thence North 89°39'55" West 106.00 feet along said northerly margin parallel with and 40.00 feet distant from said centerline to the beginning of a 40.00 foot offset to a centerline 400 foot 6°00', spiral curve to the right beginning at engineers station 181+83.38 (back); thence 395.81 feet northwesterly along said spiral offset, the chord of which bears North 87°40'33" West 395.62 feet to the beginning of a non-tangent curve concave to the north having a radius of 1869.86 feet at engineers station 177+83.38; thence westerly 86.26 feet along said curve and said northerly margin, the chord of which curve bears North 82°20'37" West 86.26 feet, to an iron rod marking the beginning of a curve concave to the northeast and having a radius of 1869.86 feet and the Point Of Beginning of the herein described tract; thence 944.35 feet northwesterly along said curve and said northerly margin, the chord of which bears North 66°33'13" West 934.34 feet to an iron rod; thence leaving said northerly margin and said curve North 29°31'40" East 695.22 feet to an iron rod; thence South 89°45'28" East 258.93 feet to an iron rod; thence South 01°52'28" West 464.21 feet to an iron rod; thence South 87°41'33 East 270.80 feet to an iron rod; thence South 00°01'38" East 500.74 feet to the Point of Beginning, containing 11.18 acres of land, more or less, as shown on a map attached hereto and made a part thereof.

Basis of Bearings for this description is Polk County Survey, CS-13069.

Title for Subject Property 9 is held in the name of 20250 INVESTMENT LLC.

12. **Subject Property 10:** 5145 Red Prairie Road, Sheridan, Oregon 97378

Parcel Number: 06634-00-00400

Description: The following described real property in the County of Polk and State of Oregon free of encumbrances except as specifically set forth herein:

All that portion of the following described tract of land lying Northerly of the State Highway: Beginning at the center of Section 34, in Township 6 South, Range 6 West of the Willamette Meridian in the County of Polk and State of Oregon; and running thence East 20.00 chains; thence North 5.71 chains; thence West 45 links, thence North 12.91 chains; thence West 19.55 chains; thence South 18.62 chains, to the place of beginning.

Excepting the North 61 feet thereof.

Title for Subject Property 10 is held in the name of Suying Liang.

13. **Subject Property 11:** 19090 Highway 22, Sheridan, Oregon 97378

Parcel Number: 06628-D0-00900

Description: The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Polk, State of Oregon:

Beginning at a point 20.14 chains North from the Southwest corner of the Isaac Gilstrap Donation Land Claim, Notification No. 4985, Claim No. 53 in Section 33 of Township 6 South, Range 6 West of the Willamette Meridian, in Polk County, Oregon; thence North to a point 13.75 chains South of the Northeast corner of Lot 5, as set off to Anderson Hinshaw in that certain partition suit in the Circuit Court of the State of Oregon, for Polk County entitled Melissa Van Horn vs. Sanford Hinshaw, et al; thence West 11.00 chains; thence North 18°00' West 3.62 chains; thence North 11°30' East 2.14 chains; thence North 29° East 4.86 chains; thence North 39° East 200.0 feet, more or less, to the Southeasterly line of a tract of land

conveyed to Lawrence C. Hiatt, et ux by Deed recorded April 21, 1961 in Volume 177, Page 210 of Deed of Records for Polk County, Oregon; thence North 72° East to the said Northeast corner of said Lot 5, which is the Southeast corner of the North half of the Isaac Hinshaw Donation Land Claim, Notification No. 4968, Claim No. 52; thence South 3.11 chains along the East line of said Claim No. 52 to a point 34.23 chains North of the Southwest corner of said Gilstrap Claim No. 5; thence South 60° East 8.34 chains to the Northwest corner of the 4.00 acres tract of land sold by Tom Blair and Mary Aikman and Sam Aikman on March 21, 1949; thence South 31° 50' West 11.70 chains to the Southwest corner of said 4.00 acre tract; thence North 72° 35' West 92/100 chains to the Place of Beginning.

Title for Subject Property 11 is held in the name of Li Liu.

14. **Subject Property 12:** 91692 Taylorville Road, Westport, Oregon 97016

Parcel Number: 80635BA01700

Description: That part of parcel of land situated and being in the Northeast quarter of the Northwest quarter of Section 35, Township 8 North, Range 6 West, Willamette Meridian, County of Clatsop, State of Oregon, which is more particularly described and bounded as follows:

From the Northeast corner of the Northwest quarter of Section 35, marked by an iron pipe 2" in diameter by 6' long, proceed thence South along the East boundary of said quarter Section a distance of 681.6 feet; thence North 50° 40' West a distance of 131 feet; thence North 77° 50' West 209 feet; thence South 12° 10' West 22 feet to a point on the South side of the right of way of the Columbia Highway, which is the point of beginning of the description of the tract hereby conveyed; thence South 12° 10' West 275 feet; thence North 77° 50' West 60

feet; thence North 12° 10' East 275 feet to a point on the South side of the right of way of said highway; thence South 77° 50' East 60 feet to the point of beginning.

Title for Subject Property 12 is held in the name of Renxian Deng.

15. **Subject Property 13:** 8850 Red Prairie Road, Sheridan, Oregon 97378

Parcel Number: 06610-00-01400 01

Description: The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Polk, State of Oregon:

Beginning at a point which is 29.00 chains South of the Northwest corner of the Donation Land Claim of Hankinson F. Read and wife, being Claim No. 63 in Township 6 South, Range 6 West of the Willamette Meridian in Polk County, Oregon; running thence North 16 rods; thence East 100 rods; thence South 16 rods; thence West 100 rods to the place of beginning. Title for Subject Property 13 is held in the name of Lucky 25500 Investment LLC.

16. **Subject Property 14:** 7575 Blanchard Road, Sheridan, Oregon 97378

Parcel Number: 06623-00-00100

Description: Real property in the County of Polk, State of Oregon, described as follows:

Beginning at the Northwest corner of the "L" of WM. Conners Donation land claim in section 14, Township 6 South, Range 6 West of the Willamette Meridian, Polk County, Oregon, and running thence South on the line between WM. Conner and James Morgan's Donation land claim's 16 rods; thence East to the public road; thence Northeasterly along said public road to the line between W. Conners and James Morgan donation land claim; thence west along said line to the place of beginning.

Title for Subject Property 14 is held in the name of Su Yi Liang.

17. **Subject Property 15:** 2880 Kings Valley Hwy, Dallas, Oregon 97338

Parcel Number: 08508-00-01700

Description: The following described real property, free of encumbrances except as specifically set forth herein in the County of POLK and State of Oregon, to wit:

Beginning at a point 15.00 chains west from the Northeast corner of the donation land claim of Nicholas Lee and wife, notification No. 2287, claim No. 50, in township 8 South, Range 5 west of the Willamette meridian in Polk County, Oregon, and running thence west a distance of 4.48 chains to the Southeast corner of the R. M. Guthrie's donation land claim; thence north a distance of 4.00 chains; thence west a distance of 42.57 chains to the east line of the right of way of the Salem-Falls city and western Railroad; thence South 25° 50' East along said right of way, a distance of 6.20 chains; thence South 20° 15' East a distance of 2.00 chains; thence South 15° 30' East a distance of 2.00 chains; thence South 3° 45' East a distance of 2.00 chains; thence South 3° 30' west a distance of 6.50 chains to the Northwest corner of a tract of land sold to Nellie M. Billings; thence East a distance of 3.16 chains to the center of the County road; thence South 13° 40' East in the center of said county road a distance of 7.50 chains to the North line of a tract of land sold to I. A. Guthrie; thence east on said line a distance of 38.90 chains; thence North a distance of 21.23 chains to the place of beginning.

Excepting therefrom that tract of land described as beginning at a point in the center of the county road leading from Dallas to Corvallis 4.00 chains North and 3.00 chains west of the southwest corner of said Guthrie donation land claim: thence west 45-1/2 Links to the east Boundary line of the S.F.C. & W.R.R. Co. Right of way; thence South 28° 00' East 6.20 chains along said right of way; thence South 21° 36' East 2.00 chains; thence South 13° 56'

East 2.00 chains; thence South $4^{\circ} 56'$ East 2.00 chains; thence South $1^{\circ} 24'$ West 3.44 chains; thence leaving the railroad right of way and running thence East 3.40 chains to the center of the County road; thence North $15^{\circ} 52'$ East along the center of said county road, 1.46 chains; thence East 8.22 chains; thence North 13.25 chains; thence West 15.735 chains to the place of beginning.

Also excepting therefrom that tract described as beginning at a point where the center of said County road Crosses the South line of that tract of land described in deed recorded in Book 56, page 261, deed records for Polk County, Oregon; and conveyed by J. G. Van Orsdel and wife, to J. M. Card, the same being that principle tract herein conveyed; and running thence east a distance of 28.00 rods; thence North a distance of 17.25 rods; thence west a distance of 28.00 rods, more or less, to the center of said County road; thence Southerly along the center of said County road a distance of 17.25 rods, more or less, to the place of beginning.

Also save and except any of the above-described property lying within the boundaries of public roads and highways.

Also save and except: beginning at the Southwest corner of the P.P. Hooker Donation land claim No. 48, in Township 8 South, Range 5 West of the Willamette Meridian in Polk County, Oregon; thence North a distance of 264 feet; thence west a distance of 1771.11 feet; thence South a distance of 874.6 feet; thence Southeasterly in a straight line a distance of 510 feet, more or less, to the Northeast corner of that certain tract of land conveyed to Herbert R. Mcbee, et ux, by deed recorded October 23, 1939, in Book 102, Page 339, deed records for Polk County, Oregon; thence South a distance of 284.63 feet; thence east a distance of 2105.40 feet; thence North 1401.18 feet; thence west a distance of 295.68 feet to the place of beginning.

Further excepting therefrom a tract of land in said lee donation land claim described as beginning at the Southwest corner of the tract of land deeded by J. M. Card and wife, to Jacob Kinsey and wife, September 18, 1915, and recorded in Volume 62, Page 59, deed records for Polk County, Oregon, said point being on the easterly line of the Salem, falls city and western railroad company right of way; thence Southerly following said right of way 3.06 chains, more or less, to the Northwest corner of the tract of land deeded by J. G. Van Orsdel and wife, to Nellie M. Billings on July 18, 1908 and recorded in Volume 51, Page 365, deed records for Polk County, Oregon; thence East 3.61 chains to the center of the County road and the Northeast corner of said billings tract; thence Northerly along the center of said road to the most Southerly Southeast corner of said Kinsey tract; thence west 3.40 chains to the place of beginning.

Title for Subject Property 15 is held in the name of Ding Qiu Rong.

18. **Subject Property 16:** 4148 SE 79th Avenue Portland, Oregon, 97206

Parcel Number: 1S2E08DD-09400

Description: A tract of land situated in the southeast one-quarter of the southeast one-quarter of section 8, township 1 south, range 2 east, of the Willamette meridian, in the city of Portland, County of Multnomah, and state of Oregon, more particularly described as follows:

The North one-half of the west one-half of the following property.

Beginning at a point in the east line of the street laid out on the east side of a tract platted and known as Kent, 645.2 feet northerly from the south line of section 8; running thence Northerly, parallel with the east line of Kent, 107 feet; thence easterly on a line parallel with the south line of section 8, a distance of 406.96 feet; thence southerly parallel with the east line of section 8, a distance of 107 feet; thence westerly 406.26 feet to the place of beginning.

Title for Subject Property 16 is held in the names Hui Yuan Chen and Li Xian Chen.

19. Based on the evidence obtained in this investigation, including witness statements, property records, financial records, digital camera footage, and drug evidence seized during the execution of multiple warrants on properties related to Fayao (Paul) Rong (hereinafter “Rong”) and his co-conspirators, there is probable cause to believe that each of the Subject Properties were used and intended to be used to facilitate the manufacture of an illegal controlled substance (marijuana), with intent to distribute, in violation of Title 21, United States Code, Sections 841, 846, and 856, and are therefore subject to forfeiture pursuant to Title 21, United States Code, Section 881(a)(7).
20. The facts set forth in this affidavit are based on the following: my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; my review of records related to this investigation including interviews of witnesses; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause for the Complaint, it does not set forth each and every fact that I or others have learned during the course of this investigation.

SUMMARY OF INVESTIGATION

21. Beginning in April 2020, the Oregon State Police began receiving complaints about marijuana grows in Columbia County. The Oregon State Police initiated an investigation in July of 2020. This investigation grew in scope leading to a partnering with the Drug Enforcement Administration (DEA), the United States Attorney’s Office (USAO), the United States Marshal Service (USMS), and others.

22. The investigation identified a Drug Trafficking Organization (DTO) lead by Rong, who resides in Houston, Texas. Rong purchased numerous residential houses in Oregon and converted them with hired help into illegal indoor marijuana grows. His DTO grows, harvests, and ultimately transports marijuana to distribute in states where it is not legal, known as “black market marijuana.”
23. Investigators estimate that between August 30, 2020 and August 30, 2021, the Rong DTO trafficked an amount of black market marijuana with an approximate street value of \$13,200,000.
24. As part of the conspiracy, Rong and others were operating Subject Properties 1-11, 13, 14, and 16, as active marijuana grows, and Subject Properties 12 and 15 were in the process of being developed into marijuana grows as of September 2021.
25. To disguise his ownership in many of the Subject Properties, Rong used other individuals and corporate entities as straws to purchase the homes, pay for upgrades in utilities, and to pay utility bills. While he used straws, Rong continued to be in control of most of the houses and paid the utility bills, often in cash.
26. After developing probable cause that the Subject Properties and others were being used to facilitate the illegal production of marijuana, law enforcement applied for and obtained federal search warrants for each of the subject properties, and others. U.S. Magistrate Judge Beckerman authorized the warrants. On September 8 and 9, 2021 law enforcement executed the warrants.
27. Law enforcement also obtained a warrant to search property owned by Rong in Houston, Texas. U.S. Magistrate Judge Beckerman authorized the warrant. This warrant was also served on September 8, 2021. Rong consented to an interview with law enforcement

officials. During the interview, Rong stated that he met with a loosely organized group of Chinese individuals at a restaurant in Portland, Oregon, known as the Hong Kong Café (“the restaurant”). Rong described a type of informal cooperative where they periodically met and exchanged information on how best to establish and operate indoor marijuana grows in Oregon. Rong said the individuals he met with at the restaurant worked together to grow and sell illegal marijuana. For example, Rong stated that if one of them needed an electrician, a contractor or a grower, others would provide names to consider using. Rong said that until April of 2021, he was able to sell his marijuana at these same meetings, but that sometime after this he tried to shut the whole thing down. Rong said his other associates objected because they had already invested money into the business and would have worked for nothing, and that they needed money. Other statements Rong made during this interview are set forth throughout this declaration.

28. Probable Cause for Each Subject Property - The following is a list of each Subject

Property, along with the known ownership and evidence establishing that they are subject to forfeiture as properties used to facilitate or intended to facilitate unlawful marijuana manufacture and distribution:

a. Subject Property 1: 91844 Rulyville Road, Clatskanie, Oregon 97016

Records show 91844 Rulyville Road, was purchased by R&Y 7206 LLC on or about January 7, 2020. According to state records for R&Y 7206 LLC, Rong is the Registered Agent, and 11927 SE Boise Street, Portland, Oregon 97266, is listed as the Primary Place of Business and Mailing Address for the business. 11927 SE Boise Street is a residential home owned by Shi Qu Chen and Xiu Li Zheng. A Ford Transit Van registered to Shi Chen has been seen at several of the marijuana grows throughout the investigation. Title

records show Rong signed for R&Y 7206 LLC as a member when purchasing the property and listed 7220 Long Point Road, Houston Texas 77055 (Rong's home) as a forwarding address. Records also indicate that on more than one occasion emails were sent to Fayao Rong (Buyer) at 7220chinaone@gmail.com. The investigation has shown this email address belongs to Rong.

During Rong's interview in Houston, he claimed ownership of Subject Property 1. He told investigators he owned the property but was not actively involved in the marijuana grow. Rong identified Li Chang Chen from photographs as the person responsible for the grow at Subject Property 1. Rong said Li Chang Chen runs the grow and Rong received a portion of the proceeds for allowing him to use it. Rong stated that in 2018 or 2019 he had heard Oregon was an open market for growing marijuana, so he came and bought this location in October 2019. When asked why R&Y 7206 LLC was registered to 11927 SE Boise Street, Portland Oregon, Rong told investigators he was in "The Restaurant" (Hong Kong Café), and some unknown person offered to set up a business for him so he could buy the property. Rong said he gave the unknown person the money to set up the business.

On September 8, 2021, a search warrant was served at Subject Property 1. Li Chang Chen was present at the time of the search. Investigators interviewed Li Chang Chen regarding the marijuana conspiracy. Li Chang Chen told investigators that Rong made working and living arrangements for this indoor marijuana grow site. Li Chang Chen said he lives at Subject Property 1 rent free in exchange for tending the marijuana grow for Rong. Li Chang Chen said he gets paid approximately \$3,000 a month for tending the grow. He said he got paid in cash by a man he knows as Liang. Li Chang Chen told

investigators he speaks to Rong by cellular telephone; during these calls Rong provided directions to him regarding the marijuana grows. Li Chang Chen identified himself as the manager of the marijuana grow at subject property 1. The pictures below depict the property, and a portion of the marijuana found growing on the property at the time the warrant was served:



Figure 1: Subject Property 1, 91844 Rulyville Rd., Clatskanie, OR 97016



Figure 2: Subject Property 1, 91844 Rulyville Rd., Clatskanie, OR 97016

b. **Subject Property 2: 74853 Palm Creek Road, Clatskanie, Oregon, 97016**

Records indicate Subject Property 2 was purchased by Zhou Qu Rong. Zhou Qu Rong has been identified as Fayao Rong's biological father. Records show that Zhou Rong (hereafter ZHOU) used 7220chinaone@gmail.com (Rong's email) as his forwarding address on documents. Records also show that Zhou provided his son's phone number (646-633-0149), and address (7220 Long Point Rd. Houston, Texas 77055), and listed his son as his power of attorney during the purchase of Subject Property 2. One of the wire transfers used to pay for the home listed a JP Morgan chase account number 9895, listing "Zhou Q Rong or Fayao Rong" as the originator.

During the interview of Rong conducted on September 8th, Rong indicated Subject Property 2 was purchased by Zhou to grow marijuana. Rong initially said Rong's father was responsible for the property, but at other times during the interview Rong used the pronoun "we" when discussing the money used to purchase this property. Rong stated some Mexicans were running the marijuana grow for him at this location. Rong was shown photographs of Guatemalan Passports removed from his safe in Houston. Rong identified Christian Alexander as one of the people running the marijuana grow at Subject Property 2 for him. Rong told investigators Rong's sister gave him \$70,000 to help purchase the property. He said it was not an investment, but that he had asked his sister to help him purchase the property, and she did.

On September 8, 2021, a search warrant was served at Subject Property 2. The pictures below depict the property, and a portion of the marijuana found growing on the property at the time of the warrant:



Figure 3: Subject Property 2, 74853 Palm Creek, Clatskanie, OR. 97016



Figure 4: Subject Property 2, 74853 Palm Creek Rd. Clatskanie, OR. 97016

c. **Subject Property 3: 74471 Palm Creek Road, Clatskanie, Oregon 97016**

Records show this property was purchased by a New York resident named Liao Zhonghong on or about May 15, 2020. Records associated with the purchase of Subject Property 3 indicate Liao Zhonghong was staying at 91716 Taylorsville Road, Clatskanie, Oregon during the purchase of the property. 91716 Taylorsville Road is a marijuana grow owned and controlled by Rong and his father Zhou but is not one of the properties sought to be forfeited in this declaration and complaint. The same property record indicates that Liao Zhonghong wanted to close the purchase of the property via an electronic signing. The email address he gave to have the purchase documents sent to him was 7220chinaone@gmail.com. This email address is known to belong to Rong, who regularly used this email address to conduct business related to the purchase and operation of many of the properties discussed in this declaration.

During the interview conducted on September 8th, Rong claimed Subject Property 3 belonged to his "Uncle." He told investigators it was not his real uncle but a friend he calls uncle. After saying it belonged to his "Uncle," Rong explained how this was a fully financed property he could not put in his name, so he recruited someone to put it in their name.

Rong claimed there was no marijuana being grown at Subject Property 3. Rong said they had used the money (equity) from one house to purchase other houses. When I spoke with the investigators who interviewed Rong, they described him using cupped hands to describe taking the money from one home to buy another, and the money from that home to buy another. Later in the interview Rong was asked to identify various individuals by photograph. When shown a picture of an individual named Ha Lam, Rong identified Lam

as the cook at the 74471 Palm Creek property. Rong stated he needed to have cooks for workers at the indoor grow sites.

On September 8, 2021, a search warrant was served at Subject Property 3. When investigators entered the residence, they found a WiFi router with an orange sticky note attached to it with “Rong0149” written on it. 0149 is the last four digits of Rong’s known cellphone number.

The pictures below depict the property, and a portion of the marijuana found growing on the property at the time of the search warrant:



Figure 5: Subject Property 3, 74471 Palm Creek Rd. Clatskanie, OR. 97016



Figure 6: Subject Property 3, 74471 Palm Creek Rd. Clatskanie, OR. 97016

d. Subject Property 4: 22197 Swedetown Road, Clatskanie, Oregon 97016

Records indicate Subject Property 4 is owned by Manching Lai and Junmei He. A truck known by investigators to be owned and used by Rong has been seen at Subject Property 4, and in October of 2020 Rong contacted a Peoples Utility District (PUD) Operations Manager about the utilities at this property.

During the interview of Rong conducted on September 8th, Rong claimed he did not know the individuals at Subject Property 4 and denied having contacted PUD about the property. On September 8, 2021, a search warrant was served at Subject Property 4. The pictures below depict the property, and a portion of marijuana found during the execution of the search warrant:



Figure 7: Subject Property 4, 22197 Swedetown Rd. Clatskanie, OR. 97016

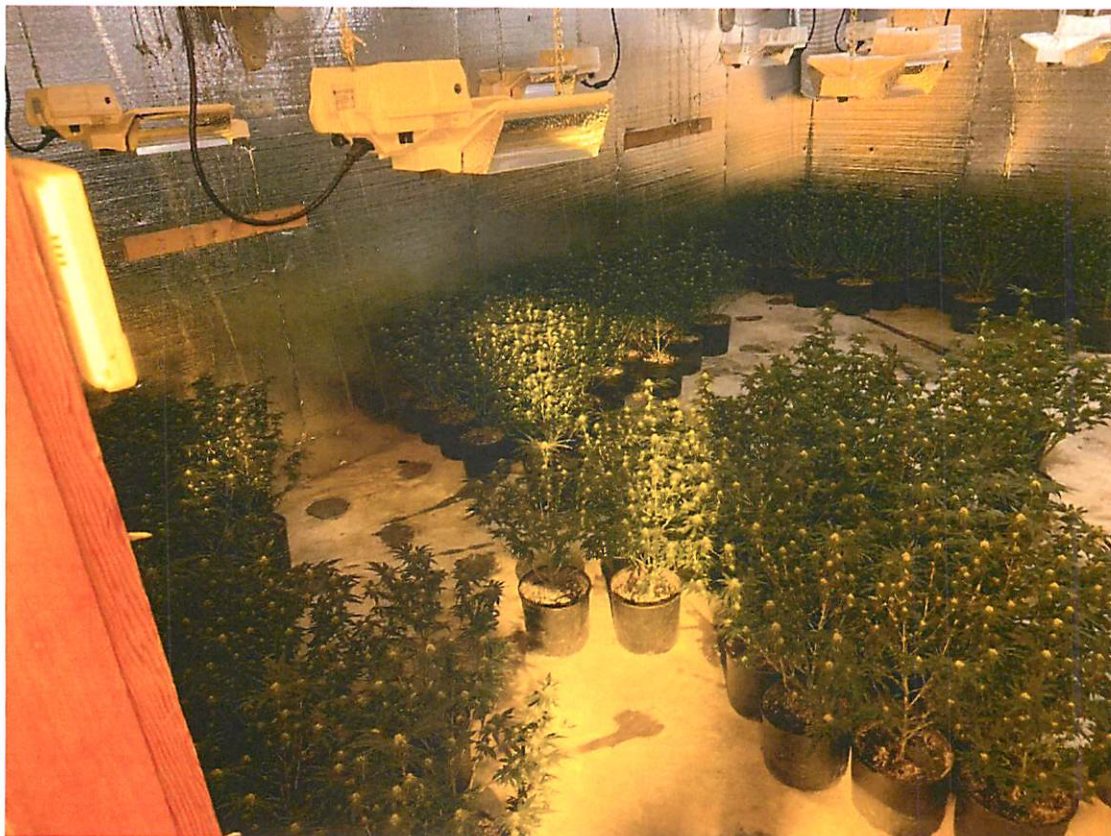


Figure 8: Subject Property 4, 22197 Swedetown Rd Clatskanie, OR. 97016

e. Subject Property 5: 6525 Rickreall Road, Clatskanie, Oregon 97351

Records indicate Subject Property 5 was purchased by “TJ Investments 1628 LLC” on or about November 1, 2019. TJ Investments 1628 LLC is a company founded by Chi Teng Liao (Rong’s business partner) and Sujuan Liang (Rong’s wife). Records show the email address associated with TJ Investments is tony1628@yahoo.com. The physical address listed for “TJ Investments 1628 LLC” is 2150 63rd Street, Brooklyn NY. This property is owned by Nen Chang Wu. Based on long term shared addresses, investigators believe Nen Wu is Chi Teng Liao’s wife. During the purchase of Subject Property 5, Rong’s wife relinquished her interest in TJ Investments. Records indicate on August 3, 2021, TJ Investments 1628 LLC sold Subject Property 5 to “Xiaoyan 7220 Investments LLC.” Xiaoyan is Rong’s mother-in-law. 7220 are the numbers of Rong’s street address in Houston, Texas.

Utilities for Subject Property 5 are subscribed in the name of Chi Teng Liao and Zhou Rong (Rong’s father). Li Liu has been identified as a Rong associate. Her phone number, as well as Rong’s email and phone number, are listed as the point of contact with the power provider for this property. Li Liu is the owner of Subject Property 11, and her name and phone number are associated with utilities and permits at Subject Properties 5, 6, 9, & 12. Rong has paid for permits at Subject Property 5. During the interview of Rong conducted on September 8th, Rong said he had wired funds to “TJ Investments 1628 LLC” to purchase Subject Property 5.

Rong’s wife, Sujuan Liang, was also interviewed by investigators on September 8th. She told investigators that Chi Teng Liao was the one who initially approached Rong with the idea of starting marijuana grows in Oregon. When investigators asked Sujuan

Liang why her name was listed in some of the business registrations related to the Oregon marijuana properties, she said people would come to her, and others, and offer to pay \$1,000 or so to use her name on documents. She said she never received the money but believes her husband may have been paid for the use of her name on documents.

On September 9, 2021, a search warrant was served at Subject Property 5. The pictures below depict the property, and a portion of marijuana found growing on the property at the time of the warrant:



Figure 9: Subject Property 5. 6525 Rickreall Rd. Independence OR. 97351



Figure 10: Subject Property 5, 6525 Rickreall Rd. Independence OR. 97351

f. **Subject Property 6: 17344 Powers Creek Loop NE, Silverton, Oregon 97381**

Records indicate Subject Property 6 was purchased by Jin Feng Li, on or about November 11, 2019. The email address Jin Feng Li provided in property records is tony1628@yahoo.com. This email address is known to belong to Chi Teng Liao, Rong's business partner. Rong associate Li Liu is named on the gas permit at this location. Investigators identified a picture of Subject Property 6 on Rong's publicly viewable Facebook page. The picture was dated April 22, 2020. In the picture a large building is under construction. When search warrants were served on September 9, 2021, I observed that this building had been completed and that the property contained a large, active marijuana grow.

During the interview of Rong conducted on September 8th, Rong claimed he did not know the individuals associated with Subject Property 6. When it was mentioned that this property had appeared on his Facebook page, Rong initially denied having a Facebook page, but then later said that even if investigators had seen his Facebook page, he did not know whether it contained a picture of this location.

On September 9, 2021, a search warrant was served at Subject Property 6. The pictures below depict the property and a portion of the marijuana found growing on the property at the time of the warrant:



Figure 11: Subject Property 6, 17433 Powers Creek Loop NE, Silverton, OR. 97381



Figure 12: Subject Property 6, 17344 Powers Creek Loop NE. Silverton, OR. 97381

g. **Subject Property 7: 1305 Clark Mill Road, Sweet Home, Oregon 97386**

Records show Subject Property 7 was purchased by “T&Y 6409 Investments LLC,” on or about October 7, 2019. Jin Feng Li (owner of Subject Property 6) is the registered agent for T&Y 6409 Investments. Subject Property 6 is listed in state records as the corporate address for T&Y 6409 Investments. Bank records in the name of T&Y 6409 Inc. were obtained from Royal Business Bank Account. The bank records also list Subject Property 6 as the business address of T&Y 6409 Inc., and name Rong’s business partner, Chi Teng Liao, as the owner of T&Y 6409 Inc.

Records obtained by investigators establish that Rong provided about \$276,000 used for the purchase of Subject Property 7.

On September 9, 2021, a search warrant was served at Subject Property 7. The pictures below depict the property and a portion of marijuana found growing on the property at the time of the warrant:



Figure 13: Subject Property 7, 1305 Clark Mill Rd. Sweet Home OR. 97386



Figure 14: Subject Property 7 Street numbers



Figure 15: Subject Property 7, 1305 Clark Mill Rd. Sweet Home, OR. 97386 Grow

h. Subject Property 8: 31131 Old Santiam Highway, Lebanon, Oregon, 97355

Records show Subject Property 8 is owned by 31131 Investment LLC, which is owned by Daron Liang. Hui Yuan Chen is the subscriber for power at Subject Properties 7 and 8, in his own name or in the name of H&Y 4148 Inc, a company which he owns. Investigators have seen a Toyota RAV4 with Oregon plate 943EUM at subject properties 8 and 16 on multiple occasions. This vehicle is registered to Lixian Chen at Subject Property 16. Subject Property 16 is owned by Hui Yuan Chen and Li Xian Chen, who appear to be husband and wife. Hui Yuan Chen and Li Xian's sons' names are Jian Hui Chen and Jianan "Sam" Chen. Jian Hui Chen is the owner of 40850 Mcdowell Creek Road, Lebanon, Oregon 97355. This property is another illegal marijuana grow in this conspiracy.

During the interview of Rong conducted on September 8th, Rong denied any knowledge of this property. He acknowledged seeing "Jaejin" at the restaurant (Hong Kong Café). Based on the investigation, Jaejin Chen is a co-conspirator who transported money and engaged in other marijuana operation tasks for Rong's business partner, Chi Teng Liao.

Rong said he knew Jaejin as Jay. Rong also stated he had heard of Daron at the restaurant (Hong Kong Café), but he had never met him. During an interview with Jaejin Chen he told investigators he had met Daron Liang, when Daron had come to dinner at Subject Property 11. Jaejin identified Daron Liang by photograph.

On September 9, 2021, a search warrant was served at Subject Property 8. At the time of the warrant service a handwritten note was identified near the front door. It read "Please call 971-340-0080 for any delivery." This number is associated to Jianan Chen.

The pictures below depict the property, and a portion of marijuana found growing on the property at the time of the warrant:



Figure 16: Subject Property 8, 31131 Old Santiam Highway, Lebanon, OR. 97355



Figure 17: Subject Property 8, 31131 Old Santiam Highway, Lebanon, OR. 97355

i. Subject Property 9: 20250 Highway 22, Sheridan, Oregon, 97378

Records show Subject Property 9 was purchased on or about May 1, 2020, by 20250 Investment LLC. 20250 Investment is owned by Daron Liang. Power is subscribed to Hui Yuan Chen, who is also the subscriber for utilities at Subject Properties 7 and 8.

During the interview of Rong conducted on September 8th, Rong said he had no association with this property. He was familiar with the property but would not say how or what was happening there.

On September 9, 2021, a search warrant was served at Subject Property 9. During the service of that warrant investigators found Weipan Chen located on the property. During an interview of Weipan Chen he told investigators he is paid about \$4,000 a month in cash to work at this location. Weipan Chen said he is paid by someone named “Brother Chen” in cash. He said “Brother Chen” just shows up and pays them. He told investigators he works normal hours on the farm trimming and maintaining the marijuana. The pictures below depict the property and a portion of the marijuana found growing on the property at the time of the warrant:



Figure 18: Subject Property 9, 20250 Highway 22, Sheridan, OR. 97378

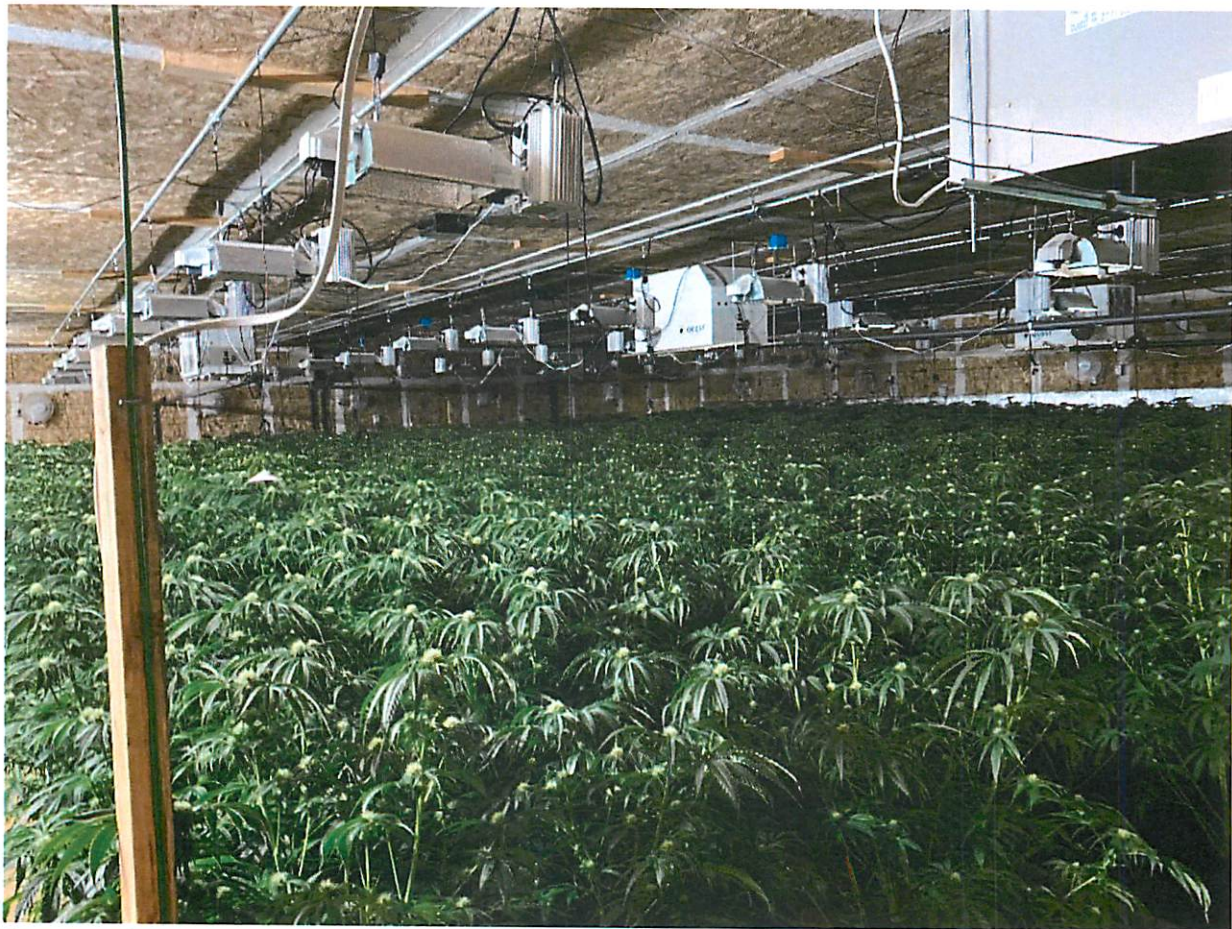


Figure 19: Subject Property 9, 20250 Highway 22, Sheridan, OR. 97378

j. Subject Property 10: 5145 Red Prairie Rd. Sheridan, Oregon 97378

Records show Subject Property 10, was purchased by Suying Liang on or about March 17, 2020. Suying Liang is Rong's sister-in-law. The power for Subject Property 10 is in Jaejin Chen's name. Rong stated in his interview on September 8th that he had seen Jaejin at the restaurant (Hong Kong Café) and knew him as Jay. The property records list Suying's address as both 7220 Long Point and 7206 Long Point Road, Houston, Texas 77055. Both refer to a joint parcel of land containing Rong and his wife's physical residence in Houston, Texas. The records also show Suying Liang's phone number as 646-633-0149. This number is Rong's cellphone number. Records indicate the signing for the loan was conducted at 7220 Long Point Road, Houston, Texas.

During the interview of Rong conducted on September 8th, Rong initially admitted to investigators that he had purchased Subject Property 10 in April 2020 to produce marijuana. Rong told investigators his wife's sister Suying was financing the purchase. Rong made conflicting statements as to whether Suying was aware of the marijuana grow. On September 9, 2021, a search warrant was served at Subject Property 10. The pictures below depict the property, and a portion of the marijuana found growing on the property during the search:



Figure 20: Subject Property 10, 5145 Red Prairie Rd. Sheridan OR. 97378



Figure 21: Subject Property 10, 5145 Red Prairie Rd. Sheridan, OR. 97378

k. Subject Property 11: 19090 Highway 22, Sheridan, Oregon 97378

Records show Subject Property 11 was purchased by Rong associate Li Liu on or about May 14, 2020. Investigators have found that Li Liu, also known as “Lilly,” obtained permits, and pays utilities at multiple marijuana grows associated with Rong and his business partner Chi Teng Liao.

During the interview of Rong conducted on September 8, 2020, Rong was asked if he knew Li Liu. Rong said he knew the name, but he didn’t know who Li Liu was. However, records show that between December 4, 2020, and March 18, 2021, Li Liu and Rong’s cell phones contacted each other 236 times.

On September 9, 2021, a search warrant was served at Subject Property 11. At the time the search warrants were executed investigators interviewed Jaejin about the conspiracy and his role in it. Jaejin told investigators that Subject Property 11 was owned by Lilly Liu, but the boss was his uncle Chi Teng Liao, who goes by Tony. This interview is described in more detail later in this declaration. The pictures below depict the property, and a portion of the marijuana found growing on the property at the time of the search warrant:



Figure 22: Subject Property 11, 19090 Highway 22, Sheridan, Oregon 97378



Figure 23: Subject Property 11, 19090 Highway 22, Sheridan, Oregon 97378

I. Subject Property 12: 91692 Taylorville Road, Westport, Oregon 97016

Records show Subject Property 12 was purchased by Renxian Dang on or about March 10, 2021. Investigators found that Rong paid the earnest money from an account in his name. Rong also used businesses owned and controlled by him to pay approximately \$114,000 toward the balance of this property. The records further show that Renxian Dang named Rong in a Power of Attorney.

During the interview of Rong conducted on September 8, 2021, Rong said Subject Property 12 belongs to his mother in China. When shown a photograph of Renxian Dang, Rong identified her as his mother.

An application to upgrade power has been filed with the PUD for this property and the reason for the upgrade according to the applicant was to “use power for grow lights.” The applicant was an electrician who investigators know did the electrical work for many of Rong’s indoor grow sites.

On September 8, 2021, a search warrant was served at Subject Property 12. At this time investigators observed that the interior of the house had been altered in a manner consistent with the properties containing active marijuana grows described in this declaration. The pictures below depict the property and the preparations that had been made to grow marijuana at the time the search warrant was executed:



Figure 24: Subject Property 12, 91692 Taylorville Rd., Westport, OR 97016



Figure 25: Subject Property 12, 91692 Taylorville Rd., Westport, OR 97016, Grow tables consistent with other grow sites. The linoleum seen here is also used at other Rong grow sites.



Figure 26: Subject Property 12, 91692 Taylorville Rd. Westport, OR 97016, OSB lining the walls throughout the house, external plugs and wiring, PVC water pipes running along the ceiling, all of this is consistent with other grows in the conspiracy.

m. Subject Property 13: 8850 Red Prairie Road, Sheridan Oregon 97338

Records show Subject Property 13 was purchased on April 22, 2020, by Lucky 25500 Investment LLC. Lucky 25500 Investment LLC is owned by Rong's wife. The primary place of business for Lucky 25500 Investment LLC is Subject Property 1. Subject Property 13 was paid for from two main sources: a loan of \$240,000, from Advanced Investment Corp. (AIC), and a wire of \$189,532.98 from a Chase Bank account known to belong to Rong's wife. The money for this payment was wired into the Chase Bank account from a number of businesses associated with Rong, and \$70,000 from China.

During the interview of Rong's wife, Sujuan Liang, conducted in Houston on September 8, 2021 she told investigators she believed Lucky 2550 Investments was created to buy a house in Oregon to grow bamboo.

During the interviews of Rong conducted on September 8th, Rong said he had purchased the property as a rental and didn't know what they were doing there. Later, Rong admitted someone was growing marijuana there and when they sold the marijuana, he got some of the profits.

On September 9, 2021, a search warrant was served at Subject Property 13. The pictures below depict the property, and a portion of marijuana found growing on the property at the time of the warrant:



Figure 27: Subject Property 13, 8850 Red Prairie Road, Sheridan Oregon 97338



Figure 28: Subject Property 13, 8850 Red Prairie Road, Sheridan Oregon 97338

n. Subject Property 14: 7575 Blanchard Road, Sheridan, Oregon 97378

Records show Subject Property 14 was purchased by Su Yi Liang on or about April 14, 2020. During that purchase, Rong's address, cell phone number and email were listed as the contact information for Su Yi Liang.

During the September 8th interview Rong said Subject Property 14 belongs to Suying Liang. Rong made conflicting statements on whether Suying knew about the marijuana grow. Rong told investigators this property was the same as Subject Property 10; investigators asked if Rong meant that he had asked Suying for money to purchase a home to grow marijuana, with the understanding that in the future the family would share in the profits. Rong agreed with this statement. However, he then told investigators

Suying didn't know anything about the marijuana. Rong says he asked his sister-in-law to allow him to use her name to buy a property, and then everyone would get some money each month. Rong then stated he has been doing this for years.

Suying owns Subject Property 10, however Su Yi is a different sister-in-law of Rong, and she owns Subject Property 14 according to county records. I believe that Rong mistakenly identified Suying as owning both properties. I believe this is because Rong controls both properties and has put his sister-in-laws' names on them to disguise and conceal his connections to the properties.

On September 9, 2021, a search warrant was served at Subject Property 14. The pictures below depict the property, and a portion of the marijuana found growing on the property at the time of the warrant:



Figure 29: Subject Property 14, 7575 Blanchard Rd. Sheridan, OR. 97378



Figure 30: Subject Property 14, 7575 Blanchard Rd. Sheridan, OR. 97378

o. Subject Property 15: 2880 Kings Valley Highway, Dallas, Oregon, 97338

Records show Subject Property 15 was purchased by Ding Qiu Rong on or about May 16, 2020. During the purchase Rong's email address (7220chinaone@gmail.com) and phone number (646-633-0149) were used for Ding Qiu Rong. Investigators believe Subject Property 15 is being built into a large marijuana grow. Concrete has been delivered to Subject Property 15, paid for by Zhou Rong (Rong's father).

During the interview of Rong conducted on September 8th, Rong said this property belongs to his “brother,” Ding Qiu Rong. Rong told investigators there was no marijuana at Subject Property 15, and they stopped everything there months prior.

On September 9, 2021, a search warrant was served at Subject Property 15. During the service of the warrant officers observed a large, graded area on the property that appeared to be preparations for a large building consistent with the type of indoor marijuana grow depicted throughout this declaration. Dwayne Sterba is a coconspirator who owns a property on which Rong grows marijuana. Sterba’s company has also done extensive work on Rong’s marijuana grows. During an interview conducted on September 8, 2021, Sterba identified Subject Property 15 as one of Rong’s marijuana grows he had done construction work on or delivered goods to. Inside a shop near the prepared land was industrial level power infrastructure consistent with providing the amount of electrical power needed to operate an indoor marijuana grow.

Investigators also learned that permits were filed at the Polk County permitting office to build two 11,152 square foot workshops at this location. The permits listed Rong’s phone number and email (7220chinaone@gmail.com) as the point of contact. Based on the industrial sized power upgrades already at this location, the permits filed to construct two 11,152 square foot buildings, and the modus operandi of the Rong DTO, I believe this location was in the process of being converted into a marijuana grow site.

The pictures below depict the property and the preparations being made to grow marijuana:



Figure 31: Subject Property 15, 2880 Kings Valley Highway, Dallas, OR. 97338



Figure 32: Subject Property 15, 2880 Kings Valley Hwy. Dallas OR. 97338, Industrial Power Infrastructure



Figure 33: Subject Property 15, 2880 Kings Valley Highway, Dallas OR. 97338, Prepared Ground

p. Subject Property 16: 4148 SE 79th Avenue, Portland, Oregon 97266

Records show Subject Property 16 was purchased by Hui Yuan Chen, and Li Xian Chen, on or about October 29, 2007. Hui Yan Chen is the subscriber for power at Subject properties 7 and 8.

On September 8, 2021, a search warrant was served on Subject Property 16. During the search, investigators found a small marijuana grow in a shed consisting of 225 small marijuana plants. In the basement was 328 pounds of processed marijuana, in one-pound bags, with an approximate street value of \$1,148,000 in states where marijuana is illegal. In the living room was a rifle and ammunition.

During an interview with Jianan “Sam” Chen, he told investigators his parents Lixian and Hui Yaun Chen own two marijuana grows in the Salem area. Jianan Chen said his

parents had started growing marijuana in the shop at Subject Property 16 after they lost their jobs due to Covid, around April of 2020. He had been to the grows before and the power at one of the grows is in his name. Jianan acted as a translator while investigators interviewed Hui Yuan Chen. Hui Yuan Chen told investigators he started growing marijuana in his garage when he got fired from his job and the operation got bigger over time. He owns two marijuana grows. 40850 Mcdowell Creek Road, Lebanon, 97355, is owned by Jian Chen (Hui Yuan Chen's son) according to county records. It is unclear which other property Hui Yuan Chen is claiming ownership of at this time. When asked how he sells his marijuana, Hui Yuan Chen told investigators someone he does not know calls him and tells him where to bring the marijuana. After being shown pictures of known conspirators, Hui Yuan Chen pointed out Rui Liang and said on two occasions he had dropped off marijuana with him.

The pictures below show Subject Property 16, and some of the evidence found on the property at the time of the warrant:



Figure 34: Subject Property 16, 4148 SE 79th, Ave. Portland, OR. 97206

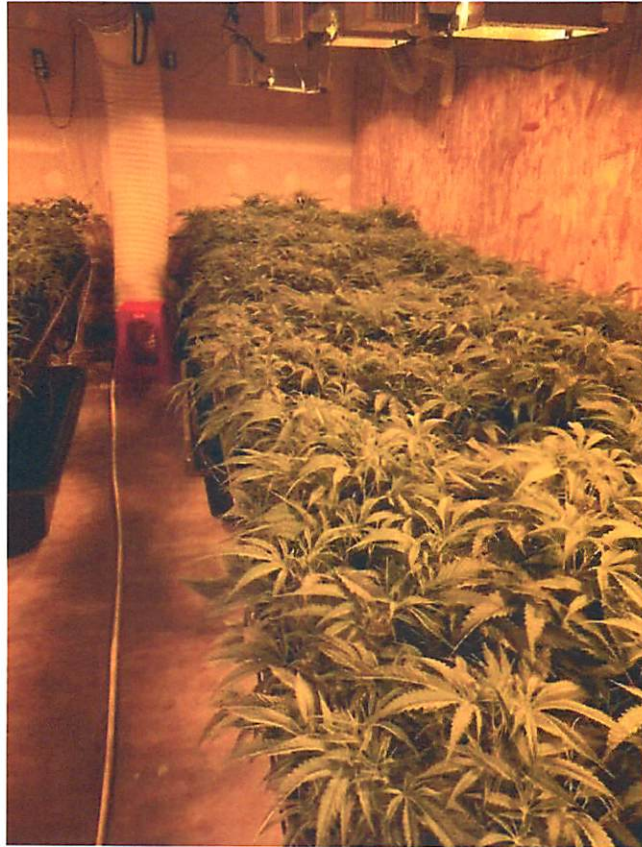


Figure 35: subject Property 16, 4148 SE 79th Av. Portland OR. 97206, shed grow



Figure 36: Subject Property 16, 4148 SE 79th Av. Portland OR. 97206, Processed Marijuana

29. Investigators ran a check on all 16 of the Subject Properties with Oregon Liquor and Cannabis Commission (OLCC) and found none were state-licensed marijuana grow sites. OLCC is the agency that regulates the recreational marijuana market in Oregon. Investigators also checked the Oregon Medical Marijuana Program (OMMP), the agency that regulates the medical marijuana market in Oregon and found no state approval or authorizations for growing marijuana at any of the Subject Properties.
30. Many of the Subject Properties were occupied at the time investigators executed search warrants. Investigators interviewed occupants about their knowledge of the marijuana grows on the properties they occupied, and their role in the overall conspiracy. Many confessed to assisting the marijuana grow operation. Some individuals claimed to be cooks and janitors, but admitted they filled those roles in support of others tending the marijuana. To the best of my knowledge, no interviewed occupants asserted they were unaware of the marijuana being grown. Investigators are not aware of any Subject Property where the occupants were unaware of the indoor marijuana grows.
31. During the search warrants served on September 8th and 9th, several interviews were conducted. Some of these interviews contained information relating to the structure of the organization. The overall view of the conspiracy revealed by the interviews and evidence establishes that, regardless of who may legally own the property according to county records, Fayao Rong and Chi Teng Liao are part of an organization which control and operate these properties, and others, as part of a large-scale Drug Trafficking Organization.
32. Rui Liang is a known associate of Rong in Portland, Oregon. He lived in a Portland residence which was the subject of one of the search warrants and was interviewed during the service of that warrant. Rui Liang admitted he helped convert many of the Oregon properties

to indoor grow sites for Rong. Rui Liang said he took his instructions from Rong and was unaware of any other boss besides Rong. Rui Liang had over \$100,000 in cash in a safe in his house. He told investigators this was money Rong gave him to pay people at the marijuana grows.

33. Dwayne Sterba (Sterba) owns a property that was the subject of one of the search warrants served in this case. Sterba was interviewed by investigators when that warrant was executed. Sterba said Rong is the head of a large marijuana growing organization. Sterba said Rong pays him rent to grow marijuana on Sterba's property. Sterba told investigators he owns an excavation company and has done work at many of the Oregon properties Rong owns. Sterba stated that Rong had introduced him to Chi Teng Liao as his partner. Sterba identified Lichang Chen as an individual who tends the marijuana grow on Sterba's property for Rong, and Lichang Chen has paid Sterba the rent for the marijuana grow Rong operates on his property. Sterba identified Ding Rong as an individual he had met several times and that Rong introduced to him as Rong's brother. Sterba identified Subject Properties 5, 6, 8, 9, 10, 11, 13, and 14 as properties he had either done work on or delivered items to at Rong's direction to help prepare the properties to grow indoor marijuana.

34. Jaejin Chen told investigators the boss was his uncle Chi Teng Liao, who goes by Tony. Jaejin said he was approached by Chi Teng Liao with the opportunity to make money and he took it. Jaejin has met Rong and believed Rong and Chi Teng Liao were partners in growing marijuana. Jaejin identified Li Chang Chen as Rong's representative in the area and also identified Rui Liang and Ken Chen as working for Rong. Jaejin said he had met Daron Liang when Daron came to dinner at Subject Property 11. Jaejin had met Ding Rong at Subject Property 13. Jaejin also recognized Jianan Chen and Jian Chen from marijuana grows but

could not remember which ones. Jaejin told Investigators the Ford Transit vans used to shuttle marijuana and supplies to the grow sites belong to him, and he makes payments on them, but Rong had given him the money for the down payments.

35. Rong has generally claimed to investigators that the Oregon properties are owned by family members and close friends with no knowledge of the marijuana growing activities. However, he also provided conflicting information that these individuals did know of the marijuana grows, or he confirmed the straw nature of the Oregon property purchases. He did not directly name Chi Teng Liao as his partner, but the investigation to date reflects their business relationship, such as their joint efforts to purchase Oregon properties, develop the infrastructure for indoor grows, and to hire help to operate the grows.

CONCLUSION

36. The evidence presented in this declaration shows that Subject Properties 1-16 were used or intended to be used to illegally manufacture and distribute marijuana, in violation of Title 21, United States Code, Sections 841, 846, and 856, and are therefore subject to forfeiture pursuant to Title 21, U.S.C., Section 881(a)(7).
37. I have presented this declaration to Assistant United States Attorney Christopher Cardani, who has advised me that, in his opinion, the proposed complaint is supported by probable cause for each Subject Property.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. §1746

Dated this 8th day of October, 2021.


DEPUTY JAMES STRATTON
United States Marshall Service